

**Remarks**

In the final Office Action, the Examiner rejected claims 1-4, 6, 8, 9, 13-15, 17, 23-26, 28, 30, 31, 35-37, 39, 46-49, 52-55, 58 and 60 under 35 U.S.C. § 103(a) based on U.S. Published Patent Application 2004/0249801 to Kapur (“Kapur”) in view of U.S. Published Patent Application 2005/0234709 to Klavans et al. (“Klavans”); rejected claims 7 and 29 under 35 U.S.C. § 103(a) based on Kapur, Klavans, and the document “How to get a site listed in Google Glossary?” (“Maurer”); rejected claims 10-12, 32-34, 50 and 56 under 35 U.S.C. § 103(a) in view of Kapur and Klavans, and further in view of U.S. Published Patent Application 2004/0073541 to Lindblad et al. (“Lindblad”); rejected claims 18, 19, 40, and 41 under 35 U.S.C. § 103(a) in view of Kapur and Klavans and U.S. Patent 6,922,809 to Coden et al. (“Codan”); and rejected claims 20-22, 42-44, 51, and 57 under 35 U.S.C. § 103(a) in view of Kapur and Klavans and U.S. Patent No. 6,701,309 to Beeferman et al. (“Beeferman”).

By this Amendment, Applicant proposes amending claims 1, 2, 4, 14, 23, 24, 26, 29, 36, 46, 47, 53, and 60 to improve form and cancelling claims 15 and 37 without prejudice or disclaimer. Claims 1-4, 6-14, 17-26, 28-36, 39-44, 46-58, and 60 would remain pending.

Support for the proposed amendments to claims 1, 23, 46, 47, 53, and 60 can be found throughout the specification and, for example, at least at page 8, lines 9-15 of the originally filed specification. Support for the proposed amendments to claims 14 and 36 can be found throughout the specification and, for example, at least at page 6, lines 14-16 of the originally filed specification.

*Rejection of Claims Under 35 U.S.C. § 103(a)*  
*Based on Kapur and Klavans*

Claims 1-4, 6, 8, 9, 13-15, 17, 23-26, 28, 30, 31, 35-37, 39, 46-49, 52-55, 58 and 60 stand rejected under 35 U.S.C. § 103(a) based on Kapur and Klavans.

Amended claim 1, for example, is directed to a system providing definitions. The system includes a server configured to receive a phrase to be defined, select a plurality of documents each containing at least one definition, and matching the phrase to at least one of the definitions from the plurality of documents. The system further includes a user interface configured to present one or more definitions, determined based at least in part on the matching, for the phrase. The one or more definitions are presented in an order determined based on a ranking of the documents that contain the presented one or more definitions.

Kapur is directed to a universal search interface. (Kapur, Title). According to Kapur, a universal interface is configurable to interface with multiple applications resident on users' computers. (Kapur, paragraph 0007). One of these applications, as described by Kapur, appears to be a dictionary application that, when the user enters the phrase "define (argument)," where argument is a text term for which a definition is sought, the system of Kapur locates the dictionary definition and provides it to the user as a separate web page. (Kapur, paragraph 0176).

Klavans is directed to the generation of dictionary entries. More particularly, Klavans discloses a system for automatically generating a dictionary from full text articles extracts <term, definition> pairs from full text articles and stores the <term, definition> pairs as dictionary entries. (Klavans, Abstract). Klavans discloses that the

articles can be articles from a local database or on the Internet. (Klavans, paragraph 0027).

Neither Kapur nor Klavans, either alone or in combination, disclose or suggest each of the features recited in amended claim 1. Neither Kapur nor Klavans, for example, disclose or suggest presenting one or more definitions, determined based on a matching, for a phrase, the one or more definitions being presented in an order determined based on a ranking of the documents that contain the presented one or more definitions.

Kapur, in response to receiving a text term for which a definition is sought, discloses “locating the dictionary definition and provides it to the user.” (Kapur, paragraph 0176). Kapur does not disclose any additional details as to how the definition is located or presented to the user. Thus, Kapur does not disclose “presenting one or more definitions ... in an order determined based on a ranking of the documents,” as recited in claim 1.

Klavans, like Kapur, also fails to disclose or suggest this feature of claim 1. Klavans does not disclose ranking documents, much less presenting definitions in an order determined based on the ranking of documents, as recited in claim 1.

Claims 14 and 15, as presented in the previous Amendment, included some features related to those now recited in the proposed amendment of claim 1. In rejecting these claims, the Examiner points to paragraphs 0025 and 0176 of Kapur. (Final Office Action, page 5). Applicant respectfully disagrees with the Examiner’s interpretation of these sections of Kapur as it may relate to amended claim 1.

Paragraph 0025 of Kapur, for instance, states:

Referring to FIG. 2, according to one embodiment, server system 160 is configured to provide search result data and media content to client system 120, and server system 150 is configured to provide data and media content such as web pages to client system 120, for example, in response to links selected in search result pages provided by server system 160. As will be described in more detail below, server system 160 in one embodiment references various collection technologies for populating one or more indexes with, for example pages, links to pages, etc. Such collection technologies include automatic web crawlers, spiders, etc., as well as manual or semi-automatic classification algorithms and interfaces for classifying and ranking web pages within a hierarchical structure. In certain aspects, server 160 is also configured with search related algorithms for processing and ranking web pages, such as for example, the PageRank algorithm from Google. Server 160 is also preferably configured to record user query activity in the form of query log files.

Although this section of Kapur discusses ranking web pages, ranking web pages and returning ranked web pages to a user is different than the features recited in claim 1.

Ranking web pages is simply not, as recited in claim 1, a user interface configured to present one or more definitions, determined based on the matching, for the phrase, the one or more definitions being presented in an order determined based on a ranking of the documents that contain the presented one or more definitions. In claim 1, definitions are presented in an order based on the ranking of documents. This section of Kapur merely discloses ranking web pages, which the Examiner contends corresponds to the claimed documents.

Paragraph 0176 of Kapur is also not particularly relevant to “presenting one or more definitions ... in an order determined based on a ranking of the documents,” as recited in claim 1. This section of Kapur generally relates to functionality provided by a universal dialog box (UDB) interface provided by Kapur. For example, paragraph 0176 of Kapur, states, in describing Fig. 8:

The system locates the dictionary definition and provides it to the user as a separate web page. In this example, the system also performs a search for the argument and provides the results below the definition as shown.

(Kapur, paragraph 0176). As described by Kapur, the “web results” shown in Fig. 8 appears to be search results corresponding to a standard web search that is performed based on the terms for which the user is seeking a definition. The definition shown in Fig. 8 of Kapur, however, is not described as being presented in any particular order, much less an order determined based on a ranking of documents, as recited in claim 1.

For at least these reasons, Applicant submits that Kapur and Klavans, either alone or in combination, do not disclose or suggest each of the features recited in claim 1, and accordingly, the rejection of claim 1 based on Kapur and Klavans should be withdrawn. The rejections of claims 2-4, 6, 8, 9, 13, 14, and 17 based on Kapur and Klavans are also improper and should be withdrawn, at least by virtue of the dependency of these claims from claim 1.

Claims 2-4, 6, 8, 9, 13, 14, and 17 recite additional features that are not disclosed or suggested by Kapur. Amended claim 14, for example, recites that the documents are determined substantially in real-time in response to the phrase being received from a user. Neither Kapur nor Klavans disclose or suggest this feature. Klavans, for instance, is specifically disclosed as a system for generating dictionaries. (See Klavans, paragraphs 0005 and 0027). Klavans, however, does not disclose or suggest determining documents in real-time in response to a phrase from a user, as recited in claim 14.

Independent claims 23 and 46 also stand rejected under 35 U.S.C. § 103(a) based on Kapur and Klavans. Claims 23 and 46 recite certain features similar to, although not necessarily identical in scope to, those recited in claim 1. Accordingly, based on

rationale similar to that given above with respect to claim 1, Applicant submits that the rejection of claims 23 and 46 are also improper and should be withdrawn. The rejection of claims 24-26, 28, 30, 31, 35, 36, 39, and 40-44 based on Kapur and Klavans are also improper and should be withdrawn, at least by virtue of their dependency from claim 23.

Dependent claims 24-26, 28, 30, 31, 35, 36, 39, and 40-44 recite additional features that are not disclosed or suggested by Kapur or Klavans. Amended claim 36, for example, recites that the documents are determined substantially in real-time in response to the phrase being received from a user. As discussed above with respect to claim 14, neither Kapur nor Klavans discloses or suggests any such feature.

Independent claim 47 also stands rejected under 35 U.S.C. § 103(a) based on Kapur and Klavans. Claim 47 is directed to a system for determining definitions from distributed information stores. The system includes a search engine identifying a plurality of documents based on a search query including terms indicative of a presence of definitions, and storing information regarding each identified document. The system further includes a search front end matching a phrase for which a definition is sought against the stored information for each identified document, fetching each identified document from the distributed information store and returning one or more matching definitions, and presenting each matching definition. The one or more definitions are presented in an order determined based on a ranking of the documents that contain the presented one or more definitions.

Applicant submits that Kapur and Klavans, either alone or in combination, do not disclose or suggest each of the features recited in amended claim 47. In particular, neither Kapur nor Klavans discloses or suggests presenting definitions in an order

determined based on a ranking of the documents that contain the presented one or more definitions. As previously discussed, Kapur presents definitions to a user, but does not disclose specific details relating to how the definitions are generated. Klavans does not disclose ranking documents, much less “presenting definitions in an order determined based on a ranking of the documents that contain the presented one or more definitions,” as recited in claim 47.

For at least these reasons, Applicant submits that Kapur and Klavans, either alone or in combination, do not disclose or suggest each of the features recited in claim 47. Accordingly, the rejection of claim 47 based on Kapur and Klavans is improper and should be withdrawn. The rejection of claims 48, 49, and 52 based on Kapur and Klavans are also improper and should be withdrawn, at least by virtue of their dependency from claim 47.

Independent claims 53 and 60 also stand rejected under 35 U.S.C. § 103(a) based on Kapur and Klavans. Claims 53 and 60 recites certain features similar to, although not necessarily identical in scope to, those recited in claim 47. Accordingly, based on rationale similar to that given above with respect to claim 47, Applicant submits that the rejection of claims 53 and 60 are also improper and should be withdrawn. The rejection of claims 54, 55, and 58 based on Kapur and Klavans are also improper and should be withdrawn, at least by virtue of the dependency of these claims from claim 53.

*Rejection of Claims Under 35 U.S.C. § 103(a)  
Based on Kapur in view of Maurer*

Dependent claims 7 and 29 stand rejected under 35 U.S.C. § 103(a) in view of Kapur and Maurer. Applicant has reviewed Maurer and submits that Maurer does not

cure the deficiencies discussed above with respect to independent claims 1 and 23.

Applicant submits that at least by virtue of the dependency of these claims from claims 1 or 23, the rejection of claims 7 and 29 are improper and should be withdrawn.

*Rejection of Claims Under 35 U.S.C. § 103(a)  
Based on Kapur, Klavans, and Lindblad*

Dependent claims 10-12, 32-34, 50, and 56 stand rejected under 35 U.S.C. § 103(a) in view of Kapur, Klavans and Lindblad. Applicant has reviewed Lindblad, and submits that Lindblad does not cure the deficiencies discussed above with respect to independent claims 1, 23, 47, and 53. Accordingly, the rejection of dependent claims 10-12, 32-34, 50, and 56 are improper and should be withdrawn.

*Rejection of Claims Under 35 U.S.C. § 103(a)  
Based on Kapur, Klavans, and Coden*

Dependent claims 18, 19, 40, and 41 stand rejected under 35 U.S.C. § 103(a) in view of Kapur and Klavans and further in view of Coden. Applicant has reviewed Coden, and submits that Coden does not cure the deficiencies discussed above with respect to independent claims 1 and 23. Accordingly, the rejection of dependent claims 18, 19, 40, and 41 are improper and should be withdrawn.

*Rejection of Claims Under 35 U.S.C. § 103(a)  
Based on Kapur, Klavans, and Beeferman*

Dependent claims 20-22, 42-44, 51, and 57 stand rejected under 35 U.S.C. § 103(a) in view of Kapur and Klavans and further in view of Beeferman. Applicant has



reviewed Beeferman, and submits that Beeferman does not cure the deficiencies discussed above with respect to independent claims 1, 23, 47, and 53. Accordingly, the rejection of dependent claims 20-22, 42-44, 51, and 57 are improper and should be withdrawn.

### *Conclusion*

Applicant respectfully requests that this Amendment under 37 C.F.R. § 1.116 be entered by the Examiner, placing claims 1-4, 6-14, 17-26, 28-36, 39-44, 46-58, and 60 in condition for allowance.

In view of the foregoing amendments and remarks, Applicant respectfully requests the Examiner's reconsideration of this application, and the timely allowance of the pending claims.

For at least the foregoing reasons, Applicant respectfully requests the reconsideration of this application and the allowance of the pending claims.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-1070 and please credit any excess fees to such deposit account.

Respectfully submitted,

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